

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
NEWARK DIVISION

THE INDEPENDENCE PROJECT, INC., a New Jersey Non Profit Corporation, and RONALD MOORE, Individually,

Plaintiffs,

vs.

MID PLAZA RE, LLC, a New Jersey Limited Liability Company,

Defendant(s).

Case No.:2:17-cv-01167-JMV-MF

**NOTICE OF SETTLEMENT**

COMES NOW the Plaintiffs, The Independence Project, Inc., a New Jersey Non-Profit Corporation, and Ronald Moore, Individually, by and through their undersigned counsel, and informs the Court that the matter has been amicably settled between the Parties, subject to the final execution of the settlement documents, and hereby requests:

1. The Plaintiffs request that pursuant to a Court Order, that the case be dismissed subject to the right of any party to move the Court within sixty (60) days for the purpose of entering a Joint Stipulation for Dismissal With Prejudice, or, on good cause shown, to re-open the case for further proceedings.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of **October, 2017**, a true and correct copy of the foregoing was sent via e-mail to counsel for the Defendant, John E. MacDonald, Esq., [jmacdonald@constangy.com](mailto:jmacdonald@constangy.com), Constangy, Brooks, Smith & Prophete, LLP, 989 Lenox Drive, Suite 206, Lawrenceville, NJ 08648.

The Independence Project, Inc., et al. v.

Mid Plaza R, LLC

Case No: 2:17-cv-01167-JMV-MF

/s/Alan R. Ackerman

Alan R. Ackerman, Esq. (AA9730)

Law Offices of Alan R. Ackerman

1719 Route 10 East, Suite 106

Parsippany, NJ 07054

Telephone: (973) 898-1177

Facsimile: (973) 898-1230

[araesq@alanackermanlaw.com](mailto:araesq@alanackermanlaw.com)

and

John P. Fuller, Esq., *pro hac vice*

Fuller, Fuller & Associates, P.A.

12000 Biscayne Boulevard, Suite 502

North Miami, FL 33181

Telephone: (305) 891-5199

Facsimile: (305) 893-9505

[jpf@fullerfuller.com](mailto:jpf@fullerfuller.com)

*Attorneys for Plaintiff*